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Attorneys for Defendants  
CARRINGTON MORTGAGE SERVICES, LLC &  
CARRINGTON FORECLOSURE SERVICES, LLC  
N/K/A VYLLA SOLUTIONS, LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

WILLIAM BLACKWELL AND  
LORETTA BLACKWELL,

Plaintiff,

vs.

CARRINGTON MORTGAGE  
SERVICES, LLC AND CARRINGTON  
FORECLOSURE SERVICES, LLC,  
DOES 1-75

Defendants.

Case No.:

[Removed from the Superior Court of  
California, Monterey County, Case  
No. 24CV003236]

**NOTICE OF REMOVAL**

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1           **TO THE UNITED STATES DISTRICT COURT FOR THE NORTHERN**  
2           **DISTRICT OF CALIFORNIA, AND TO ALL PARTIES AND THEIR**  
3           **ATTORNEYS OF RECORD:**

4           **PLEASE TAKE NOTICE THAT** pursuant to 28 U.S.C. §§ 1332, 1441 and  
5           1446, Defendants Carrington Mortgage Services, LLC (“CMS”) and Carrington  
6           Foreclosure Services, LLC<sup>1</sup> now known as Vylla Solutions, LLC (“Vylla”)  
7           (collectively “Defendants”), hereby remove the state court civil action known as  
8           *William Blackwell and Loretta Blackwell v. Carrington Mortgage Services, LLC and*  
9           *Carrington Foreclosure Services, LLC*, Case No. 24CV003236, from the Superior  
10          Court of the State of California, County of Monterey, to the United States District Court  
11          for the Northern District of California. Removal is based on 28 U.S.C. §1441 because  
12          this Court has jurisdiction pursuant to 28 U.S.C. §1332. Removal is warranted based  
13          on the following:

14          **A. Defendants Have Satisfied the Procedural Requirements for Removal**

15               1. On or about August 2, 2024, Plaintiffs William Blackwell and Loretta  
16               Blackwell (collectively “Plaintiffs”) filed a Complaint in the Superior Court of the  
17               State of California, County of Monterey (the “State Court”). In compliance with 28  
18               U.S.C. § 1446(a), a true and correct copy of all process, pleadings, and orders served  
19               upon CMS and Vylla is attached hereto as **Exhibit A**.

20               2. Plaintiff served CMS and Vylla on August 16, 2024.

21               3. Therefore, this Notice of Removal is timely in that it was filed within  
22               thirty (30) days of the service of the Complaint and less than a year after the  
23               commencement of the State Court Action. *See* 28 U.S.C. § 1446(b).

24               4. This Notice is filed in the proper division because the Court embraces the  
25               Superior Court of the State of California, County of Monterey, where Plaintiff’s action  
26               is pending. *See* 28 U.S.C. §§ 1441 and 1446(a).

27  
28               <sup>1</sup> Carrington Foreclosure Services, LLC is now known as Vylla Solutions, LLC, and the name was  
recently changed in its LLC registrations.

5. No previous request has been made for the relief requested herein. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being served on Plaintiff, and a copy is being filed with the State Court Clerk.

6. There are no other identified defendants in this matter.

7. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being served on Plaintiff, and a copy is being filed with the State Court Clerk.

8. On September 9, 2024, Plaintiff filed a Petition for Relief under Chapter 13 of the Bankruptcy Code under Case No. 24-51370. Defendant CMS received notice on September 10, 2024.

9. Defendants do not consent to entry of final orders or judgment by the Bankruptcy court.

**B. Removal Is Proper Because the Court Has Diversity Jurisdiction.**

10. Under 28 U.S.C. § 1332, United States District Courts are vested with jurisdiction to consider cases or controversies where there is diversity jurisdiction and the amount in controversy exceeds \$75,000.00.

11. Removal of such cases is governed by 28 U.S.C. § 1332(a). Section 1332(a) makes clear that “district courts *shall* have original jurisdiction of all civil actions where the matter in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs, and is between – (1) citizens of different States;”

12. Here, Plaintiff’s purported cause of action requests \$1,997,876.35, plus additional damages. *See generally* Complaint.

13. Plaintiffs are residents of the State of California. *Id.*

14. Defendant Carrington Mortgage Services, LLC is a Delaware limited liability company. Carrington Mortgage Services, LLC’s members are Carrington Holding Company, LLC and Carrington Investment Partners, L.P. Carrington Holding Company, LLC is a Delaware limited liability company, whose sole member is The Carrington Companies, LLC. Carrington Investment Partners, L.P. is a Delaware limited partnership, whose general partner is Carrington Capital Management, LLC,

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1 and whose limited partners are CIP Intermediate, LLC, a Delaware limited liability  
2 company, and Carrington Holding Company, LLC. Carrington Holding Company,  
3 LLC is the sole member of CIP Intermediate, LLC. Carrington Capital Management,  
4 LLC is a Delaware limited liability company, whose members are Carrington Holding  
5 Company, LLC and a natural person. The natural person is not a citizen of the State  
6 of California, but is a citizen of the State of Tennessee. The Carrington Companies,  
7 LLC is a Delaware limited liability company, whose members are two natural persons  
8 who are not citizens of the State of California, but are citizens of the States of  
9 Tennessee and Wyoming.

10 15. Carrington Foreclosure Services, LLC, now known as Vylla Solutions,  
11 LLC is a Delaware limited liability company whose sole member is Real Estate  
12 Logistics, LLC. Real Estate Logistics LLC is a Delaware limited liability company,  
13 whose members are Carrington Holding Company, LLC, and a natural person. The  
14 natural person is a not a citizen of the State of California, but is a citizen of the State  
15 of Tennessee. Carrington Holding Company, LLC is a Delaware limited liability  
16 company, whose sole member is The Carrington Companies, LLC. The Carrington  
17 Companies, LLC is a Delaware limited liability company, whose members are two  
18 natural persons who are not citizens of the State of California, but are citizens of the  
19 States of Tennessee and Wyoming.

20 16. In accordance with 28 U.S.C. § 1446(d), the undersigned counsel certifies  
21 that a copy of this Notice of Removal and all supporting papers will be promptly served  
22 on Plaintiff, and filed with the Clerk for the Superior Court of the State of California,  
23 County of Monterey.

24 **WHEREFORE**, CMS and Vylla, by counsel, respectfully request that the  
25 above-referenced action, originally filed in the Superior Court of the State of California  
26 for the County of Monterey, be removed to this Court pursuant to 28 U.S.C. §§ 1332,  
27 1441 and 1446.  
28

1 Dated: September 16, 2024

HOLLAND & KNIGHT LLP

2  
3 By: /s/Ana Dragojevic  
Ana Dragojevic

4 Attorneys for Defendants  
5 Carrington Mortgage Services, LLC and  
6 Carrington Foreclosure Services, LLC n/k/a  
7 Vylla Solutions, LLC  
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